

# **EXHIBIT 15**

 <b>Adelanto ICE Processing Center</b>	<b>POLICY and PROCEDURE MANUAL</b> <b>CHAPTER: Detainee Work Program</b> <b>TITLE: Detainee Work Plan</b> <b>RELATED ACA STANDARDS: 4-ALDF-2A-09, 5C-06, 5C-08, 5C-10 – 12, 6B-02, 6B-05</b>	<b>NUMBER:</b> <b>8.1.8</b> <b>SUPERCEDES:</b> <b>05/02/17</b>
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## I. POLICY

To provide detainees the opportunity to participate in a voluntary work program and earn money.

## II. PROCEDURE

### A. Voluntary Work Program

Detainees who are physically and mentally able to work will be provided the opportunity to participate in a voluntary work program.

No detainee or group of detainees will be given control, or allowed to exert authority, over other detainees. [4-ALDF-2A-09]

The detainee's classification level will determine the type of work assignment for which he/she is eligible. Level 3 detainees shall not be given work opportunities outside of their housing units/living area. IGSA detainees are never allowed to work outside the secure perimeter.

General work assignments do not require specific skills. A sample of work assignments follow:

1. Kitchen worker (either shift)
2. Recreation/Library/Barber
3. Living area clean-up/janitorial
4. Area cleaning (inside facility)
5. Area cleaning (outside facility inside secure fence)
6. Evening workers (building janitorial)
7. Maintenance
8. Laundry

### B. Voluntary Work Program Objectives

Through the voluntary work program:

1. Physically and mentally able detainees are gainfully employed while contributing to the orderly operation of the facility;
2. Essential operations and services improve through the productivity of detainees; and
3. Inactivity-induced idleness and disciplinary-code violations will decline.

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### C. Required Work Assignments

Work assignments are voluntary. Detainees are not required to work except to do personal housekeeping and to clean their housing area. Detainees are required to maintain their immediate living areas in a neat and orderly manner. This involves making their beds daily, stacking loose papers, keeping the floor free of debris and dividers free of clutter, and hanging/draping no articles of clothing, pictures, keepsakes, or other objects from beds, overhead lighting fixtures, or other furniture.

### D. Voluntary Special Details

Detainees may volunteer for the temporary work details that occasionally arise. The work, which generally lasts from several hours to several days, may involve labor-intensive work.

### E. Detainee Selection

1. Detainee will submit a completed job application to the classification staff..
2. Classification staff shall review the detainee's classification and other relevant documents in the detainee's detention file and/or A-file.
3. Classification staff shall assess the detainee's language skills as it affects the detainee's ability to perform the specific requirements of the job under supervision. To the extent possible, work opportunities should be provided to detainees who are able to communicate with supervising staff effectively and in a manner that does not compromise safety and security.
4. Inquiries to staff about the detainee's attitude and behavior may be used as a factor in the selection.
5. Staff shall explain the rules and regulations as well as privileges relating to the detainee worker's status. The detainee is required to sign a **voluntary work program agreement** before every new assignment.
6. Completed agreements shall be filed in the detainee's detention file.
7. The same procedures apply for replacement workers as for "new" workers.

### F. Discrimination in Hiring Detainee Workers

Volunteering detainees will not be denied work opportunities based on non-merit factors, such as race, religion, national origin, gender, sexual orientation, or disability.

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## G. Physically and Mentally Challenged Detainees

The *Adelanto ICE Processing Center* maintains custody of physically and mentally challenged detainees whose disabilities range from minor to debilitating. While some of these individuals' medical restrictions will prevent them from working, those with less severe disabilities will have the opportunity to participate in the voluntary work program, in appropriate work projects. Discrimination on the basis of disability is prohibited in the detainee work program.

The selecting official must consider the precise limitations of a disabled individual before rejecting certain work assignments. Expediency or convenience will not justify the rejection of a detainee who, with reasonable accommodation, can perform the essential function of the work involved. In disputed cases, the official will consult medical personnel to ascertain the detainee's assignability with regard to a given project.

## H. Hours of Work

The detainee workday approximates the workday in the community. Detainees participating in the volunteer work program are required to work according to a fixed schedule. The normal scheduled workday for a detainee employed full-time is a maximum of 8 hours. Detainees who wish to participate in the work program will not be permitted to work in excess of 8 hours daily, 40 hours weekly.

Detainee performance will be regularly evaluated and recorded.

Unexcused absences from work or unsatisfactory work performance may result in removal from the voluntary work program.

### General Work Assignments

1. Food Service workers
2. Living area clean-up/janitorial
3. Area cleaning (inside facility)
5. Evening workers (building janitorial)
6. Maintenance
7. Laundry
8. Barber

## I. Work Restrictions

A detainee may participate in only one work detail per day. Also, the detainee is required to sign a voluntary work program agreement before every new assignment. Completed agreements will be filed in the detainee's detention file.

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#### **J. Compensation**

Detainees shall receive a stipend of \$1.00 per day, to be paid daily.

#### **K. Removal of Detainee from Work Detail**

A detainee may be removed from a work detail for such causes as:

Unsatisfactory performance;

Disruptive behavior, threats to security, etc.;

Physical inability to perform all functions required by the job, whether because of a lack of strength or a medical condition;

Prevention of injury to the detainee;

A removal sanction imposed by the Institutional Disciplinary Panel for an infraction of a facility rule, regulation, or policy.

When a detainee is removed from a work detail, written documentation of the circumstances and reason for removal will be placed in the detainee detention file.

#### **L. Detainee Responsibility**

Detainees will be informed of their responsibilities by the assigned supervisor prior to beginning work in that area.

The detainee is expected to be ready to report for work at the required time. The detainee may not leave an assignment without permission.

The detainee will perform all assigned tasks diligently and conscientiously. Removal from the work detail and/or disciplinary action may result when a detainee evades attendance and performance standards in assigned activities, or encourages others to do so.

The detainee will exercise care in performing assigned work, using safety equipment and other precautions in accordance with the work supervisor's instructions. In the event of a work-related injury, the detainee shall notify the work supervisor, who will immediately implement injury-response procedures (see Section II, N., below).

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## M. Detainee Training and Safety

1. Detainee working conditions shall comply with all applicable federal, state, or local work safety laws and regulations, including but not limited to: Occupational Safety and Health Administration (OSHA) regulations, National Fire Protection Association, 101 Life Safety Code, American Correctional Association Standards (ACA) for Adult Local Detention Facilities, Bureau of Immigration and Customs Enforcement (I.C.E.) Environmental Occupation Safety and Health Detention Standards.
2. Upon the detainee's assignment to a job or detail, the supervisor shall provide thorough instructions regarding safe work methods and, if relevant, hazardous materials. The supervisor shall demonstrate safety features and practices. Workers will learn to recognize hazards in the workplace, to understand the protective devices and clothing provided, and to report deficiencies to their supervisors. "Lack of knowledge or skill" as an accident's cause will not be tolerated. Therefore, the detainee shall undertake no assignment before signing a volunteer work program agreement. Among other things, by signing the agreement the detainee confirms he/she has received and understood training about the assigned job from the supervisor. This agreement will be placed in the detainee's detention file.
3. Medical staff will ensure detainees are medically screened and certified before undertaking a food service or bartering assignment.
4. The facility will provide detainees with safety equipment that meets OSHA and other standards associated with the task performed.

## N. Detainee Injury and Reporting Procedures

If a detainee is injured while performing his/her work assignment, the ICE COR will immediately be notified and the following procedures will apply:

1. The work supervisor will immediately notify the facility medical staff and the Assistant Facility Administrator.
2. First aid will be administered when necessary.
3. Medical staff will determine what treatment is necessary and where that treatment will take place.
4. The **work supervisor** will complete a detainee accident report and submit it for review and processing. The report will be distributed as follows:

Classification (for placement in the detainee's detention file)  
 Facility Administrator

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Assistant Facility Administrator  
Fire and Safety Manager  
Health Services Administrator

#### O. Verification Documents

1. The Classification Officer will forward verification documents to medical for security-approved applicants that have been detained at the GEO Group Inc., Adelanto Detention Facility for at least 14 days. Only kitchen and barbershop applicants will require this process.
2. The Medical Department will review the medical status of the applicant and will determine if the detainee has a medical or psychological condition limiting his ability to work.
3. When the Classification Officer receives an approved verification document from the medical department, the detainee will be added to the verification document pending approval, upon approval from the responsible shift supervisor the applicant will be added to the worker list as a paid worker or volunteer.
4. If a food service worker is not utilized in food service for a period exceeding two weeks, the Classification Officer and medical staff must review and approve their further use.

NOTE: Any food service worker placed on a suicide watch will not be authorized to perform any food services duties, unless authorized to do so by the Facility Administrator in conjunction with the Health Services Administrator.

#### P. Food Services Worker Log

The Food Service Administrator shall maintain a log of the status of all food services workers. This log will reflect the following information:

1. Detainee ID and name
2. Date cleared for kitchen
3. Date commenced work
4. Completion of hygiene, kitchen equipment and chemical training
5. Annual approval review dates
6. Date terminated kitchen work

#### Q. Work Detail Job Descriptions

The Office Records Manager will maintain written work detail job descriptions.

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**THIS POLICY WILL BE REVIEWED AT LEAST ANNUALLY AND UPDATED AS NEEDED.**

*Italic areas are the changes made to the current revision.*

**QUESTIONS/SUGGESTIONS REGARDING THIS POLICY SHALL BE ADDRESSED TO  
THE ASSISTANT FACILITY ADMINISTRATOR OF SECURITY.**

APPROVED: \_\_\_\_\_  
Facility Administrator

EFFECTIVE: June 15, 2018

Reviewed & Revised: October 2011

Reviewed & Revised: June 2012

Reviewed: July 2013

Reviewed & Revised: August 2014

Reviewed: July 2015

Reviewed: March 2016

Reviewed: March 2017

Reviewed & Revised: June 15, 2018